

FEIN, SUCH, KAHN & SHEPARD, PC.

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R.A. LEBRON, ESQ. (RL-7029)
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IN RE:

DEANNA L. FIELD and
EDWARD Q. FIELD

Debtors.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Chapter 7

Case No. 08-35580 MBK

**NOTICE OF MOTION TO VACATE
AUTOMATIC STAY PURSUANT TO 11
U.S.C. 362 (d)**

Hearing Date: March 02, 2009

TO: BARRY W. FROST, ESQ.
TEICH GROH
691 STATE HIGHWAY 33
TRENTON, NJ 08619-4407
Debtors' Attorney

JOHN MICHAEL McDONNELL
TRENK DIPASQUALE, ET AL.
115 MAPLE AVENUE
SUITE 201
RED BANK, NJ 07701
Trustee in Bankruptcy

DEANNA L. FIELD
EDWARD Q. FIELD
1249 BEAR TAVERN ROAD
TITUSVILLE, NJ 08560
Debtors.

SIR and MADAM:

PLEASE TAKE NOTICE that the undersigned attorney for the Secured Creditor, COUNTRYWIDE HOME LOANS SERVICING, LP, shall move before the, United States Bankruptcy Judge, HONORABLE MICHAEL B. KAPLAN, 402 EAST STATE STREET, TRENTON NJ 08608 on the 2nd day of March, 2009, at 10:00 a.m., or as soon thereafter as counsel may be heard, for the following relief:

A. For an Order to Vacate the Automatic Stay pursuant to 11 U.S.C. 362 (d) (1) and/or (2) to permit COUNTRYWIDE HOME LOANS SERVICING, LP, to proceed against the Debtors and to foreclose upon residential real property of the Debtors known as 1249 BEAR TAVERN RD, TITUSVILLE, NJ 08560 (hereinafter "Premises"), by any lawful means in the Superior Court of New Jersey, Chancery Division; and

B. For such other relief as is just.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel will rely upon the Affidavit of COUNTRYWIDE HOME LOANS SERVICING, LP.

Dated: February 10, 2009

FEIN, SUCH, KAHN & SHEPARD, PC.
Attorneys for Secured Creditor,
COUNTRYWIDE HOME LOANS SERVICING, LP

By: /S/ R.A. LEBRON, ESQ.